

**IN THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF WISCONSIN**

**THE UNITED STATES OF AMERICA  
AND THE STATE OF WISCONSIN**

**Plaintiffs,**

**v.**

**NCR CORPORATION, *et al.*,**

**Defendants.**

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**No. 10-CV-00910-WCG**

**CERTAIN DEFENDANTS'<sup>1</sup> RESPONSE TO OBJECTIONS BY THE UNITED STATES  
AND NCR CORPORATION TO THE ADMISSION OF CERTAIN EXHIBITS CITED IN  
RESPONSIVE POST-TRIAL BRIEFS**

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<sup>1</sup> Certain Defendants are Menasha Corporation, P.H. Glatfelter Company, and WTM I Company. CBC Coating, Inc. joins only in Sections I., II., and IV.

## **I. Introduction.**

Certain Defendants hereby respond to the Plaintiffs' Objections To Exhibits Cited By NCR Corporation And The Certain Defendants In Their Respective Responses To Findings Of Fact And Conclusions Of Law ("Plaintiffs' Second Objections"), Dkt. 771, and NCR Corporation's ("NCR") Objections To Certain Exhibits Cited In The Parties' March 1, 2013, Post-Trial Response Briefs ("NCR's Second Objections"), Dkt. 774, in accordance with the Stipulation and Proposed Order Regarding Exhibits for the December 2012 Trial ("Stipulation Regarding Exhibits"), Dkt. 718.

## **II. Plaintiffs And NCR Have Waived Objections To Numerous Trial Exhibits.**

Pursuant to the Stipulation Regarding Exhibits, each exhibit that has been placed on Plaintiffs' and Defendants' Combined Trial Exhibit List ("Exhibit List"), Dkt. 716, will be admitted into evidence for all purposes unless an objecting party states and substantiates its reserved objections to that exhibit following the procedure set forth in the Stipulation Regarding Exhibits. Except for the exhibits discussed in Section III, *infra*, Plaintiffs have not stated or substantiated their reserved objections to any of the exhibits placed on the Exhibit List by Certain Defendants. *See* Dkt. 750 [Plaintiffs' First Objections] and Dkt. 771 [Plaintiffs' Second Objections]. Therefore, Plaintiffs have waived any objections to all of the exhibits listed in the attached Table 1. Similarly, NCR has waived all objections to the exhibits listed in Table 1. *See* Dkt. 752 [NCR's First Objections] and Dkt. 774 [NCR's Second Objections].

### **III. Demonstrative Exhibits 8557, 8559, And 8561, And Page 18 Of Exhibit 8350 Are Admissible.**

In their post-trial responsive brief, OU1 Defendants<sup>2</sup> seek to admit the demonstrative exhibits 8557, 8559 and 8561 under Federal Rule of Evidence 1006 and a single page of Victor Magar's report—Exhibit 8350—in response to a trial objection by the United States. Dkt. 769 at 14 n.8. Both NCR and the United States objected to the admission of demonstrative exhibits 8557, 8559 and 8561. Dkt. 771 [Plaintiffs' Second Objections] at 3-4; Dkt. 774 [NCR's Second Objections] at 5. Plaintiffs object to the admission of page 18 of Ex. 8350. Dkt. 771 at 2-3. The Court should admit these exhibits.

Federal Rule of Evidence 1006 allows parties to offer summaries of data “to prove the content of voluminous writings . . . that cannot be conveniently examined in court,” as long as the underlying voluminous writings are made available to the other parties for examination. Plaintiffs argue that a summary is only admissible if the underlying source data is admissible. Dkt. 771 [Plaintiffs' Second Objections] at 4. Plaintiffs fail to recognize that OU1 Defendants already have met this requirement. Exhibits 8557, 8559 and 8561 all summarize the data contained in the Lower Fox River database compiled and maintained by the Wisconsin Department of Natural Resources. This database has been available to all parties for some time. Defendant P.H. Glatfelter Company (“Glatfelter”) produced the database prior to trial as GLT-ENF001958, and listed it on the Exhibit List as Exhibit 8389. Dkt. 716 at 171. The database was not objected to by any party and is admitted into evidence for all purposes. *Id.* Exhibit 8389 contains over 30,000 rows of data and hundreds of thousands of cells, which makes it a perfect candidate for summarization. *See United States v. Smyth*, 556 F.2d 1179, 1183 n.9 (5th Cir. 1977). Further, two of the demonstrative exhibits previously were produced by Glatfelter as

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<sup>2</sup> The OU1 Defendants are Menasha Corporation, P.H. Glatfelter Company, and WTM I Company.

exhibits to Dr. Magar's expert report. *Compare* Ex. 8350 at GLT-ENF001824 and Ex. 8557; *compare* Ex. 8350 at GLT-ENF001832 and Ex. 8559. No party questioned the accuracy of the demonstrative exhibits or their underlying data. The exhibits should be admitted under Federal Rule of Evidence 1006.

Page 18 from Dr. Magar's expert report (Exhibit 8350) should be admitted to refute Plaintiffs' trial objection to the scope of Dr. Magar's testimony. *See* Tr. 1597:17-1599:20 (Magar). The Court asked Plaintiffs' counsel to assert or withdraw the objection after Dr. Magar's testimony progressed. *Id.* Plaintiffs' counsel neither asserted nor withdrew the objection. Further, Plaintiffs again questioned the scope of Dr. Magar's testimony in their post-trial brief. February 4, 2013 Proposed Findings Of Fact And Conclusions Of Law For The Phase 1 Trial ("Plaintiffs' Post-Trial Brief"), Dkt. 738 at 24. Exhibit 8350, as well as Dr. Magar's trial testimony, makes clear that Dr. Magar opined that OU1 Defendants did not cause the need to remediate areas downstream of OU1. Ex. 8350 at GLT-ENF001791; *see, e.g.*, Tr. 1596:7-1617:21 (Magar).

#### **IV. Certain Defendants' Additional Reserved Objections Have Been Adequately Substantiated, And Should Therefore Be Sustained.**

NCR's incorrect argument against the chart Certain Defendants included as Appendix A to Certain Defendants' Objections To The Admissibility Of Certain Exhibits ("Certain Defendants' February 19, 2013 Objections"), Dkt. 751, is the only response by any party to the objections asserted in Appendix A. *See* Dkt. 766 at 17. As Certain Defendants previously explained, Certain Defendants' Appendix A *in conjunction with* Section IV of Certain Defendants' February 19, 2013 Objections was the only practical way to substantiate legitimate objections to over 500 inadmissible exhibits. *See* Certain Defendants' Objections To The Admission Of Certain Exhibits Cited In Plaintiffs And NCR Corporation's Responsive Post-

Trial Briefs (“Certain Defendants’ March 6, 2013 Objections”), Dkt. 772 at 9-10. Plaintiffs have not similarly argued that Certain Defendants’ objections are not substantiated. Rather, Plaintiffs argued that it is illogical for Certain Defendants to object based on authenticity to certain Administrative Record Exhibits because Certain Defendants agreed to admit those exhibits for resolution of the remedy challenge.<sup>3</sup> But, Certain Defendants raised additional objections beyond authenticity to each of the Administrative Record Exhibits listed in Appendix A. Therefore, at a minimum the Court should sustain all of Certain Defendants’ objections to exhibits listed in Appendix A for which Plaintiffs or NCR did not offer a specific response.

**V. Plaintiffs’ Untimely Evidence Of The Authenticity Of Certain Exhibits Prejudices Certain Defendants, Is Inadmissible, And Does Not Prove The Authenticity Of The Exhibits In Question.**

On March 1, 2013, Plaintiffs indicated they intended to “submit declarations by March 12, 2013 establishing the authenticity and hearsay exceptions for a variety of disputed documents.” Plaintiffs’ Response To NCR Corporation’s And The Certain Defendants’ Objections To The Admission Of Certain Trial Exhibits (“Plaintiffs’ Responses to Objections”), Dkt. 761 at 33. Plaintiffs filed three declarations on March 12, 2013. *See* Dkt. 777 to 779. These new submissions are inconsistent with the procedures agreed to by the parties and adopted by the Court. Moreover, this belated effort to authenticate only the “important” Administrative Record Exhibits is a tacit admission that exhibits contained within the Administrative Record lack sufficient proof of their authenticity. *See id.* at 32-33. Plaintiffs cannot claim to be prejudiced unfairly if they are denied the opportunity to correct this self-inflicted injury:

- The Administrative Record, in various iterations, has been in Plaintiffs’ possession for years. *See, e.g.,* Declaration Of Lawrence Schmitt In Support Of Motion For

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<sup>3</sup> Certain Defendants explained the nature of Plaintiffs’ error on this point in their March 6, 2013 Objections, Dkt. 772 at 3-6.

Preliminary Injunction, Dkt. 125 at 5, ¶ 10 (“EPA and WDNR have compiled an administrative record supporting their remedy selection decisions for the Site”); *see also* Third Notice Of Availability Of Administrative Record Materials, Dkt. 474; Certificate Of Service And Second Notice Of Availability Of Administrative Record Materials, Dkt. 324.

- Since no later than October 14, 2010, Plaintiffs have known that at least some Administrative Record Exhibits would be relevant to their case-in-chief. Complaint, Dkt. 1.
- Since no later than November 13, 2012, Plaintiffs have been on notice that Defendants reserved the right to object to the admissibility of Administrative Record Exhibits. Order Re: Pretrial & Trial Procedures, Dkt. 610 at 7, n.8; *see also* Dkt. 772 [Certain Defendants’ March 6, 2013 Objections] at 2-5.
- On November 20, 2012, Plaintiffs moved *in limine* to admit certain exhibits, including at least six Administrative Record Exhibits. *See* Dkt. 645 to Dkt. 646-4. On November 28, 2012, the Court denied Plaintiffs’ motion *in limine* as premature because the parties were still negotiating how to address objections to exhibits. Dkt. 696 at 4.
- Since no later than December 4, 2012, Plaintiffs have known they would argue their case-in-chief at least in part based on Administrative Record Exhibits. The United States represented to the Court that documentary evidence from the Administrative Record would support the United States’ case-in-chief, in response to motions for entry of judgment pursuant to Federal Rule of Civil Procedure 52(c) by NCR, P.H. Glatfelter Company, and Menasha Corporation. Tr. 463:11-467:23.

The foregoing shows that Plaintiffs had ample opportunity to address the evidentiary defects of the Administrative Record Exhibits according to the procedures agreed upon by the parties and ordered by the Court, but chose not to do so. Instead, Plaintiffs apparently made the strategic decision to argue that Defendants had waived their objections to the Administrative Record Exhibits. By comparison, any attempt now by Plaintiffs to correct these deficiencies at this late stage would be untimely and prejudicial to Certain Defendants:

- The Stipulation Regarding Exhibits requires parties to object to Administrative Record Exhibits cited in the February 4, 2013 proposed findings of fact and conclusions of law no later than February 19, 2013; otherwise, those objections are waived. Dkt. 718 at 2.
- Plaintiffs cited numerous Administrative Record Exhibits in Plaintiffs' Post-Trial Brief, Dkt. 738, to which Certain Defendants raised objections, Dkt. 751 [Certain Defendants' February 19, 2013 Objections] at 9-14 & App'x A.
- Plaintiffs offered to authenticate Administrative Record Exhibits in their March 1, 2013 response, but actually did not do so; Plaintiffs only offered to do so by March 12, 2013. *See* Dkt. 761 [Plaintiffs' Responses to Objections] at 32-33.
- Pursuant to the Stipulation Regarding Exhibits, "any objections to those Exhibits not stated and substantiated in the March 6, 2013 briefs are deemed waived." Dkt. 718 at 3. Plaintiffs' evidence purporting to authenticate certain Administrative Record Exhibits was not filed until March 12, 2013. The Stipulation Regarding Exhibits does not provide for additional briefing after March 12, 2013 in which Certain Defendants could respond to address Plaintiffs' untimely effort to authenticate Administrative Record Exhibits. Plaintiffs have disregarded the procedures agreed to by the parties

and adopted by the Court, and Certain Defendants therefore reserve the right to respond to Plaintiffs' eleventh-hour filing beyond the scope of the Stipulation Regarding Exhibits.

However, in order to address Plaintiffs' untimely effort to authenticate Administrative Record Exhibits in accordance with the Stipulation Regarding Exhibits, Certain Defendants respond as follows:

Out of 1376 documents in the Administrative Record, Plaintiffs have offered declarations authenticating exactly *twenty-four* Administrative Record Exhibits. *See* Dkt. 777 to 779. Thus, instead of an effort to move the entire Administrative Record into evidence, Plaintiffs now try to provide authentication for fewer than 2% of the Administrative Record Exhibits. *See* Dkt. 761 [Plaintiffs' Responses to Objections] at 32-33. Even among this small subset of Administrative Record Exhibits, Plaintiffs have failed to meet the requirements of the Federal Rules of Evidence.

As an initial matter, the declarations themselves are inadmissible hearsay not subject to any exception. Fed. R. Evid. 801(c), 802. Declarants James Hahnenberg and James Killian were each deposed in this case, and Mr. Hahnenberg was present in the courtroom for much of the December 2012 trial. Rather than call live witnesses during trial, Plaintiffs offer three declarations purporting to provide evidence sufficient to authenticate certain exhibits under Federal Rules of Evidence 901 and 902. Moreover, Plaintiffs have offered no proof that the declarations are subject to any exception to the rule against hearsay, nor are the declarations self-authenticating under any provision of Federal Rule of Evidence 902. As such, they cannot serve as "evidence sufficient to support a finding" of the authenticity of any of the exhibits that the declarants purport to authenticate. *See* Fed. R. Evid. 901(a). Therefore, the Administrative



Record Exhibits listed in the declarations are only admissible to the extent they are self-authenticating under Federal Rule of Evidence 902.

Plaintiffs have failed to authenticate Exhibits 51, 52, 274, 414, 416, 547, 660, 883, 891, 1127, 1142, 1149, and 2113 as certified domestic records of a regularly conducted activity. *See* Dkt. 777 at 9 and 13, Dkt. 778 at 11 and 15, and Dkt. 779 at 16 and 20.<sup>4</sup> To prove self-authenticating domestic records of a regularly conducted activity, “***Before the trial or hearing***, the proponent must give an adverse party reasonable written notice of the intent to offer the record—and must make the record and certification available for inspection—so that the party has a fair opportunity to challenge them.” Fed. R. Evid. 902(11) (emphasis added). Plaintiffs’ declarations come more than three months after the start of the December 2012 trial.

Plaintiffs have failed to authenticate Exhibits 51, 52, 274, 414, 416, 547, 660, 883, 891, 1127, 1142, 1149, 1156, 1286, and 2113 as public records.<sup>5</sup> *See* Dkt. 777 at 10, Dkt. 778 at 12, and Dkt. 779 at 17. None of these exhibits bears a seal purporting to be that of the United States or any political subdivision thereof. Fed. R. Evid. 902(1). Nor do any of these exhibits meet the requirements of Federal Rule of Evidence 902(2). First, only Exhibits 1127, 1142, and 2113 bear “the signature of an officer or employee of an entity named in Rule 902(1)(A).” Fed. R. Evid. 902(2)(A). Exhibits 51, 52, 274, 414, 416, 547, 660, 883, 891, 1149, 1156, and 1286 are all unsigned. *Id.* Second, none of these exhibits has been accompanied by an adequate certification as required by Federal Rule of Evidence 902(2)(B). Even if the Court were to

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<sup>4</sup> Plaintiffs’ declarations also list Administrative Record Exhibits as subject to self-authentication as certified domestic records of a regularly conducted activity to which Certain Defendants do not object, namely Exhibits 2, 3, 5, 9, 279, 322, 409, 758, and 772.

<sup>5</sup> Plaintiffs’ declarations also list Administrative Record Exhibits as subject to self-authentication as public records to which Certain Defendants do not object, namely Exhibits 2, 3, 5, 9, 279, 322, 409, 758, and 772, and 1308.

accept the declarations Plaintiffs filed as evidence, Messrs. Warburton, Hahnenberg, and Killian all failed to affix a seal to their certifications. Fed. R. Evid. 902(2)(B).

Plaintiffs have failed to prove that “portions” of Exhibit 1286 are subject to the ancient documents exception to the rule against hearsay. Plaintiffs’ declarant, David Warburton, states that the portions in question of Exhibit 1286 are copies of documents “submitted to FWS [U.S. Fish and Wildlife Service].” Dkt. 777 at 7. Mr. Warburton cannot know whether the documents were in a place where, if authentic, they likely would be, Fed. R. Evid. 803(16), 901(b)(8); he only knows that some documents purporting to be more than 20 years old were submitted to FWS. Likewise, Mr. Hahnenberg states, “The EPA Region 5 Records Center received copies of Exhibit 1286 from the U.S. Fish and Wildlife Service.” Dkt. 778 at 9. As such, Plaintiffs have offered no proof as to the location of the ancient “portions” of Exhibit 1286 as required by the Federal Rules of Evidence 803(16) and 901(b)(8).

## **VI. Conclusion.**

For the foregoing reasons, the Court should:

- (1) Admit all of the exhibits identified in Table 1 below;
- (2) Admit Exhibits 8557, 8559, and 8561 as summaries under Federal Rule of Evidence 1006;
- (3) Admit page 18 of Exhibit 8350 for the fact of the statement;
- (4) Exclude from evidence all of the exhibits identified in Table 2 below; and,
- (5) Decline to consider Plaintiffs’ untimely and inadmissible evidence purporting to authenticate Administrative Record Exhibits, or otherwise disregard such evidence.

Dated: March 12, 2013

/s/ Philip C. Hunsucker

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**Table 1:**

The following exhibits are not subject to any objections, previously reserved objections having been waived, and therefore should be admitted into evidence for all purposes:<sup>6</sup>

6093	7312	7398	7458	7574	8365	8445	8631	8667
6094	7313	7399	7459	7575	8366	8446	8632	8668
6101	7316	7400	7460	7576	8367	8447	8633	8669
7204	7318	7401	7461	7577	8368	8448	8634	8670
7206	7319	7403	7462	7578	8369	8449	8635	8671
7207	7320	7404	7478	7661	8370	8451	8636	8672
7208	7321	7405	7483	7714	8371	8453	8637	8673
7210	7322	7406	7485	7809	8373	8454	8638	8674
7212	7323	7407	7487	7810	8374	8455	8639	8675
7213	7332	7408	7489	7811	8384	8456	8640	8676
7214	7335	7409	7490	7812	8392	8601	8641	8677
7215	7336	7411	7506	7813	8396	8602	8642	8678
7216	7337	7415	7509	7825	8400	8603	8643	8679
7217	7338	7416	7511	7827	8401	8607	8644	8680
7218	7340	7422	7518	7830	8402	8608	8645	8681
7219	7341	7423	7532	7832	8404	8609	8646	8682
7222	7342	7424	7533	7833	8405	8610	8647	8683
7223	7343	7426	7535	7843	8408	8611	8648	8684
7234	7348	7428	7539	7844	8409	8612	8649	8685
7235	7351	7429	7540	7848	8410	8613	8650	8686
7236	7353	7430	7542	7855	8411	8614	8651	8687
7237	7357	7432	7546	7857	8412	8615	8652	8688
7247	7359	7434	7548	7858	8415	8616	8653	8689
7249	7385	7436	7552	7859	8417	8617	8654	8690
7256	7386	7438	7555	7860	8425	8618	8655	8691
7263	7387	7441	7556	7861	8431	8619	8656	8692
7275	7388	7442	7557	7862	8433	8620	8657	8693
7279	7389	7443	7558	7864	8434	8621	8658	8694
7282	7390	7444	7561	7865	8435	8622	8659	8695
7283	7391	7446	7562	7866	8436	8623	8660	8696
7284	7392	7447	7563	7867	8437	8624	8661	8697
7285	7393	7448	7566	7868	8438	8625	8662	8698
7286	7394	7449	7568	7869	8439	8627	8663	8699
7298	7395	7450	7569	8226	8441	8628	8664	8700
7310	7396	7451	7570	8227	8443	8629	8665	8701
7311	7397	7452	7573	8229	8444	8630	8666	8702

8703	8726	8749	8778	8801	8824	8847	8871	9408
8704	8727	8750	8779	8802	8825	8848	8872	9409
8705	8728	8751	8780	8803	8826	8849	8873	9410
8706	8729	8752	8781	8804	8827	8850	8874	9411
8707	8730	8753	8782	8805	8828	8851	8875	9412
8708	8731	8754	8783	8806	8829	8852	8888	9413
8709	8732	8755	8784	8807	8830	8853	8889	9452
8710	8733	8756	8785	8808	8831	8854	8890	9488
8711	8734	8757	8786	8809	8832	8855	8891	9489
8712	8735	8762	8787	8810	8833	8856	8892	9775
8713	8736	8764	8788	8811	8834	8857	8893	9811
8714	8737	8766	8789	8812	8835	8858	9222	9842
8715	8738	8767	8790	8813	8836	8859	9230	9844
8716	8739	8768	8791	8814	8837	8860	9243	9850
8717	8740	8769	8792	8815	8838	8861	9244	9851
8718	8741	8770	8793	8816	8839	8862	9245	9915
8719	8742	8771	8794	8817	8840	8863	9246	9917
8720	8743	8772	8795	8818	8841	8864	9247	
8721	8744	8773	8796	8819	8842	8865	9403	
8722	8745	8774	8797	8820	8843	8867	9404	
8723	8746	8775	8798	8821	8844	8868	9405	
8724	8747	8776	8799	8822	8845	8869	9406	
8725	8748	8777	8800	8823	8846	8870	9407	

<sup>6</sup> Certain exhibits were “Admitted Subject to Relevance Objections.” *See, e.g.*, Exhibit 7207, Dkt. 716 [Exhibit List] at 132. No party has asserted relevance objections to any of these exhibits. Therefore, these exhibits now should be admitted into evidence for all purposes. Additionally, Exhibits 8871, 8872, 8875, 8888, 8889, 8890, 8891, 8892, and 8893 were admitted during trial without objections, and therefore are included as exhibits that should be admitted for all purposes.

**Table 2:**

The following exhibits should be excluded from evidence because—aside from NCR’s meritless argument—no party has opposed all of Certain Defendants’ objections in accordance with the Stipulation Regarding Exhibits:<sup>7</sup>

0274	2113	2205	2350	2509	4084	4186	4305	4371
2021	2115	2211	2353	2511	4085	4187	4306	4372
2032	2116	2212	2357	2517	4086	4188	4312	4381
2033	2117	2215	2396	2544	4087	4189	4316	4387
2034	2118	2216	2400	2547	4088	4190	4318	4388
2036	2119	2234	2401	2552	4089	4191	4319	4395
2037	2120	2235	2402	2556	4090	4192	4320	4396
2038	2123	2236	2403	2557	4091	4193	4321	4397
2039	2126	2240	2404	2566	4092	4194	4322	4401
2041	2130	2241	2405	2568	4093	4196	4323	4402
2042	2139	2242	2407	4051	4094	4198	4324	4424
2043	2146	2243	2415	4055	4112	4199	4325	4428
2044	2151	2247	2419	4058	4140	4203	4326	4429
2045	2152	2248	2420	4059	4145	4208	4327	4433
2046	2154	2249	2422	4060	4147	4217	4328	4436
2047	2155	2258	2426	4061	4157	4228	4338	4437
2048	2156	2259	2427	4062	4158	4232	4345	4438
2049	2157	2263	2436	4063	4159	4234	4346	4439
2050	2158	2274	2443	4064	4161	4239	4347	4440
2051	2159	2279	2458	4065	4170	4265	4348	4441
2054	2160	2281	2459	4066	4172	4266	4349	4442
2055	2161	2282	2461	4067	4173	4267	4350	4443
2066	2162	2287	2467	4068	4174	4270	4351	4444
2067	2163	2288	2471	4069	4175	4282	4352	4445
2068	2164	2302	2472	4070	4176	4283	4353	4446
2074	2165	2303	2477	4071	4177	4284	4354	4447
2085	2166	2312	2478	4072	4178	4285	4357	4448
2089	2167	2334	2498	4077	4179	4289	4358	4449
2090	2172	2336	2501	4078	4180	4290	4359	4450
2091	2175	2337	2503	4079	4181	4293	4366	4451
2092	2176	2340	2504	4080	4182	4296	4367	4452
2101	2180	2341	2505	4081	4183	4298	4368	4453
2107	2181	2342	2506	4082	4184	4299	4369	4454
2110	2184	2347	2507	4083	4185	4300	4370	4455

4456	4479	4500	4517	4534	4551	4568	4591	9914
4457	4480	4501	4518	4535	4552	4569	4592	9916
4458	4481	4502	4519	4536	4553	4570	4593	9918
4459	4483	4503	4520	4537	4554	4571	4594	9919
4460	4484	4504	4521	4538	4555	4572	4596	9920
4461	4487	4505	4522	4539	4556	4573	4597	9921
4462	4489	4506	4523	4540	4557	4575	4603	9922
4464	4490	4507	4524	4541	4558	4576	7007	9923
4465	4491	4508	4525	4542	4559	4577	7009	9926
4466	4492	4509	4526	4543	4560	4582	7045	9927
4467	4493	4510	4527	4544	4561	4584	7146	9928
4468	4494	4511	4528	4545	4562	4585	9904	9931
4469	4495	4512	4529	4546	4563	4586	9909	9951
4470	4496	4513	4530	4547	4564	4587	9910	9952
4471	4497	4514	4531	4548	4565	4588	9911	
4472	4498	4515	4532	4549	4566	4589	9912	
4478	4499	4516	4533	4550	4567	4590	9913	

<sup>7</sup> Exhibit 2110 was designated both as subject to Certain Defendants’ reserved objections and as “Admitted.” Dkt. 716 [Exhibit List] at 35. Exhibit 2110 was erroneously designated “Admitted,” and is therefore subject to the indicated objections.